

Case Name: Lopez et al v. Jennie's Kitchen LLC et al

Case Number: 24 CV - 02092 (PKC) (LKE)

## PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

	DONE	NOT APPLICABLE	DATE
<b>A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE</b>			
1. Rule 26(f) Conference held			07/16/24
2. Rule 26(a)(1) disclosures exchanged			07/19/24
3. Requested:			
a. Medical records authorization		X	
b. Identification of John Doe/Jane Doe defendants		X	
4. Procedures for producing Electronically Stored Information (ESI) discussed	X		
5. Protective Order to be submitted for court approval (see Standing Protective Order on the Chambers website)		X	
<b>B. SETTLEMENT PLAN</b>			
1. Plaintiff to make settlement demand			08/23/2024
2. Defendant to make settlement offer			09/23/2024
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)	X		09/23/2024
4. Settlement Conference (proposed date)		X	
<b>C. PROPOSED DEADLINES</b>			
1. Motion to join new parties			09/23/2024
2. Motion to amend pleadings			09/23/2024
3. Initial documents requests and interrogatories			08/23/2024
4. All fact discovery to be completed			11/25/2024

5. Expert discovery (only if needed)		Check here if not applicable <input checked="" type="checkbox"/>	
		DONE	NOT APPLICABLE
a.	Affirmative expert reports due		
b.	Rebuttal expert reports due		
c.	Depositions of experts to be completed		
7.	Completion of all discovery (if different from C.4)		
8.	Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated		12/02/2024
9.	If any party seeks a <b>dispositive motion</b> , date to a. file request for pre-motion conference (if required), or b. file briefing schedule for the motion		12/30/2024
10.	Proposed Joint Pre-Trial Order due (if no dispositive motion filed)		01/03/2025

**D. CONSENT TO MAGISTRATE JUDGE JURISDICTION**

1. All parties consent to Magistrate Judge jurisdiction for dispositive motions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY**

1. Motion for collective action certification in FLSA cases		X	
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification		X	
a. Response due			
b. Reply due			

**This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.**

SO ORDERED:

**LARA K. ESHKENAZI**  
United States Magistrate Judge

Date: